

TODD A. ROBERTS (SBN 129722)
 NICOLE S. HEALY (SBN 157417)
 ROPERS, MAJESKI, KOHN & BENTLEY
 1001 Marshall Street, Suite 500
 Redwood City, CA 94063-2052
 Telephone: (650) 364-8200
 Facsimile: (650) 780-1701
 Email: todd.roberts@rmkb.com
nicole.healy@rmkb.com

Attorneys for Defendants
 TLC RESIDENTIAL, INC., a corporation, and
 FRANCISCO MONTERO, an individual

JANET M. HEROLD
 Regional Solicitor
 SUSAN SELETSKY (CSBN 176106)
 Counsel for FLSA
CHERYL L. ADAMS (CSBN 208244)
 Senior Trial Attorney
 United States Department of Labor
 Office of the Solicitor
 90 7th Street, Suite 3-700
 San Francisco, CA 94103
 Direct: (415) 625-7759
 Facsimile: (415) 625-7772
 Email: Adams.Cheryl.L@dol.gov

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

THOMAS E. PEREZ, Secretary of Labor,
 United States Department of Labor,

Plaintiff,

v.

TLC RESIDENTIAL, INC. a corporation, and
 FRANCISCO MONTERO, an individual,

Defendants.

Case No. 15-cv-02776-WHA

**STIPULATED REQUEST FOR
 EXTENSION OF TIME IN WHICH TO
 COMPLETE MEDIATION**

Current Deadline: December 23, 2015

Proposed Deadline: February 26, 2016

Trial Date: December 5, 2016 ☐

AND RELATED COUNTERCLAIMS.

PURSUANT TO CIVIL LOCAL RULE 6-5, THE PARTIES HEREBY STIPULATE,
THROUGH THEIR ATTORNEYS OF RECORD:

1. On September 28, 2015, following a Case Management Conference held on September 24, 2015, the Court issued a Case Management Order referring this matter to mediation. (Docket Nos. 18 and 19).

2. Based on the date of the minute order following the case management conference (Docket No. 18), the current deadline for the mediation to be conducted is accordingly December 23, 2015.

3. Kristin W. Maloney, Esq. was subsequently appointed as the mediator. (Docket No. 20). The parties held a telephone conference with Ms. Maloney on or about November 2, 2015, at which time a mediation session was tentatively scheduled for December 8, 2015.

4. On November 15, 2015, the Defendants and Counterclaimants served their Amended Answer and Counterclaims on the U.S. Attorney's Office in compliance with Fed. R. Civ. P. 4(i)(1).

5. Fed. R. Civ. P. 12(a)(2) allows the Plaintiff 60 days from the date of service on the U.S. Attorney's office to respond to Defendant's and Counterclaimants Amended Counterclaims, making Plaintiff's response to Defendant's and Counterclaimants Amended Counterclaim due January 14, 2016.

6. The parties believe that the mediation would be of more benefit after Plaintiff responds to Defendants' and Counterclaimants Amended Counterclaims.

7. The Mediator, Ms. Maloney, is available to schedule the mediation session in the approximate February 2016 timeframe.

8. The parties request that the time to complete the mediation be extended to February 26, 2016. This request will not affect any of the other currently scheduled deadlines or dates.

Respectfully submitted,

1 Dated: December 17, 2015

ROPER, MAJESKI, KOHN & BENTLEY

2
3 By: /s/ Nicole S. Healy

4 TODD A. ROBERTS

NICOLE S. HEALY

Attorneys for Defendants and Counterclaimants

5 TLC RESIDENTIAL, INC. and FRANCISCO

6 MONTERO

7 Dated: December 17, 2015

JANET M. HEROLD

Regional Solicitor

8
9 SUSAN SELETSKY

Counsel for FLSA

10 By: /s/ Cheryl L. Adams

11 CHERYL L. ADAMS

Senior Trial Attorney

12 Attorneys for Plaintiff

13 U. S. Department of Labor

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THOMAS E. PEREZ, Secretary of Labor,
United States Department of Labor,

Plaintiff,

v.

TLC RESIDENTIAL, INC. a corporation, and
FRANCISCO MONTERO, an individual,

Defendants.

Case No. 15-cv-02776-WHA

**~~PROPOSED~~ ORDER GRANTING
STIPULATED REQUEST FOR
EXTENSION OF TIME IN WHICH TO
COMPLETE MEDIATION**

Current Deadline: December 23, 2015

Proposed Deadline: February 26, 2016


Trial Date: December 5, 2016

AND RELATED COUNTERCLAIMS.

The Court having reviewed the Parties' Stipulated Request for Extension of Time in
Which to Complete Mediation and good cause appearing therefor,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that the Parties shall
have until February 26, 2016 to complete the mediation in this matter.

Dated: December 21, 2015.


HONORABLE WILLIAM H. ALSUP
UNITED STATES DISTRICT JUDGE